

**LOWENSTEIN SANDLER LLP**

Kenneth A. Rosen, Esq.  
Bruce Buechler, Esq.  
Gerald C. Bender, Esq.  
Wojciech F. Jung, Esq.  
Shirley Dai, Esq.  
65 Livingston Avenue  
Roseland, New Jersey 07068  
(973) 597-2500 (Telephone)  
(973) 597-2400 (Facsimile)

*Proposed Counsel to the Debtors and  
Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

Dots, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 14-11016 (DHS)

(Jointly Administered)

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING (I)  
PROCEDURES FOR REJECTING UNEXPIRED LEASES OF NON-RESIDENTIAL  
REAL PROPERTY AND EXECUTORY CONTRACTS, (II) ABANDONMENT OF  
RELATED PROPERTY, (III) ESTABLISHING A CLAIMS BAR DATE, AS  
APPLICABLE, AND (IV) RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on January 21, 2014, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), by and through their undersigned counsel, filed the attached *Motion For Entry Of An Order Authorizing (I) Procedures For Rejecting Unexpired Leases Of Non-Residential Real Property And Executory Contracts, (II) Abandonment Of*

<sup>1</sup> The Debtors in these chapter 11 cases are Dots, LLC, IPC/Dots LLC, and Dots Gift LLC. The last four digits of Dots, LLC’s and IPC/Dots LLC’s tax identification numbers are (3957) and (8282), respectively.

*Related Property, (III) Establishing A Claims Bar Date, As Applicable, and (IV) Related Relief* (the “**Motion**”) [Docket No. 25].

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on **February 18, 2014 at 10:00 a.m. (Prevailing Eastern Time)** (the “**Hearing Date**”), or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey, 07102 before the Honorable Donald H. Steckroth in Courtroom #3B (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors will rely upon the Motion and the proposed form of Order submitted therewith. Oral argument is requested in the event an objection is timely filed.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion shall conform with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey (the “**Local Rules**”), shall be filed with the Court and, pursuant to Local Rule 9013-1(d), shall be served upon the undersigned so as to be received no later than seven (7) days prior to the Hearing Date. In the event that no objections are filed, the relief requested in the Motion may be granted without a hearing.

*[Remainder Intentionally Left Blank]*

Dated: January 22, 2014

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

/s/ Kenneth A. Rosen

Kenneth A. Rosen, Esq.

Bruce Buechler, Esq.

Gerald C. Bender, Esq.

Wojciech F. Jung, Esq.

Shirley Dai, Esq.

65 Livingston Avenue

Roseland, New Jersey 07068

(973) 597-2500 (Telephone)

(973) 597-2400 (Facsimile)

*Proposed Counsel to the Debtors and  
Debtors-in-Possession*